

**FILED**MAY - 6 2002  
3:05 pmKENNETH J. MURPHY, Clerk  
OHIO  
CINCINNATI, OHIO

SOUTHERN

DISTRICT OF

UNITED STATES OF AMERICA  
v.Walter M. Pugh  
c/o Butler County Jail  
Butler County, Ohio  
(Name and Address of Defendant)**CRIMINAL COMPLAINT**

CASE NUMBER:

**02 077 E**

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about April 24, 2002 in Butler county, in the Southern District of Ohio defendant(s) did, (Track Statutory Language of Offense) by force and violence and by intimidation take money belonging to or in the care, custody, control, management, and possession of First National Bank of Southwestern Ohio, 2299 Peck Boulevard, Hamilton, Ohio.

in violation of Title 18 United States Code, Section(s) 2113 (a)+(d)

I further state that I am a(n) Special Agent, FBI and that this complaint is based on the following facts:

See Attached Affidavit of Special Agent Terence F. Moran

Continued on the attached sheet and made a part hereof:

Yes

No



Signature of Complainant

Sworn to before me and subscribed in my presence,

May 6, 2002

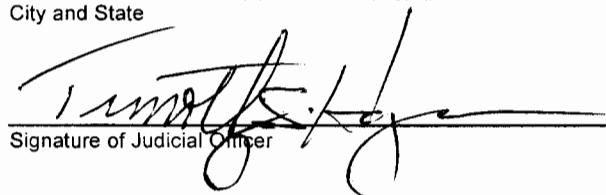
Date

at Cincinnati, Ohio

City and State

U.S. Magistrate Judge

Name & Title of Judicial Officer



Signature of Judicial Officer

Kathleen M. Bushman, AUSA 5/6/02

## AFFIDAVIT

I, Special Agent Terence F. Moran, being duly sworn, depose and say that I am a Special Agent of the Federal Bureau of Investigation (FBI), duly appointed according to law and acting as such, have been employed as a Special Agent with the FBI for 18 years. During this time, I have conducted numerous investigations of Federal laws including violations of Federal Bank Robbery Statutes. The information contained in this affidavit has been derived by investigations conducted by your affiant as well as information received by your affiant from the Hamilton Police Department, Hamilton, Ohio. All of the details of this investigation are not included in this affidavit, only information necessary to establish probable cause to believe that Walter Pugh and Tyreese Pugh robbed the First National Bank of Southwestern Ohio, 2299 Peck Boulevard, Hamilton, Ohio, on April 24, 2002. Affiant, further hereby deposes and says:

1. On Friday, April 24, 2002, the First National Bank of Southwestern Ohio, (hereinafter referred to as First Southwestern), 2299 Peck Boulevard, Hamilton, Ohio, a federally insured banking institution, was robbed by two black males. According to witnesses at the bank, the robbers entered the bank and announced the robbery. One of the robbers, who was holding what appeared to be a shotgun, stood in the main area of the bank watching the manager and other bank personnel. The second robber,

who was holding what appeared to be a long barreled revolver, vaulted the teller counter, picked up a trash can, and ordered the victim teller to remove money from the drawers and place it in the trash can. Evidence of weapons used by the robbers is derived from witness statements along with bank surveillance photographs. Several times during the robbery, the robbers ordered the teller not to include any dye packs. After obtaining money from the drawers, the robber grabbed the victim teller by her left arm and led her to the vault. Once inside the vault, the robber who continued to point the revolver at the body of the teller, ordered the teller to place the money in the trash can until she was told to stop. The robber then left the teller in the vault and shut the inner door of the vault. After taking the money, the robbers told the bank personnel to count to twenty before calling the police and also told them to have a nice day. The robbers were observed by a witness getting into a late 1980s to early 1990s vehicle, maroon in color, possibly an Oldsmobile.

2. On April 25, 2002, Detective James Calhoun, Hamilton Police Department, was given the name Walter Pugh by another officer of his department. Additional information received reveals that Bessie Pew, sister of Walter Pugh, owns a 1988 Oldsmobile Cutlass Sierra, maroon in color, which is similar to the getaway vehicle. In a signed witness statement furnished to the Hamilton Police Department, Bessie Pew states that Walter Pugh looks like one of the robbers in the bank surveillance

photograph. Detective Calhoun advised he was told by Bessie Pew that the other robber looked like Tyreese Pugh, who she identified as Walter Pugh's son.

3. On April 29, 2002, the Hamilton Police Department received a signed statement from the mother of a known associate of Tyreese Pugh. After viewing bank surveillance photographs, the individual identified Walt and Butter as the robbers in the photograph. Butter was identified by this individual as Tyreese Pugh.

4. On April 25, 2002, charges were filed by Detective Calhoun in Hamilton Municipal Court, Hamilton, Ohio, charging Walter Pugh with Aggravated Robbery and Theft in violation of Ohio Revised Code, sections 2911.01 A1 and 2913.02 respectively.

5. On April 29, 2002, charges were filed by Detective James Calhoun in Hamilton Municipal Court, Hamilton, Ohio, charging Tyreese Pugh with Aggravated Robbery and Theft in violation of Ohio Revised Code, sections 2911.01 A1 and 2913.03 respectively.

6. On May 3, 2002, Walter Pugh and Tyreese Pugh were arrested by the Hamilton County Sheriff's Office at 11979 Wincanton Drive, Cincinnati, Ohio. Arrests were based on the charges filed by the Hamilton Police Department. Incident to his arrest, Tyreese Pugh was found to be sleeping on a Mossberg

twelve gauge shotgun, serial number L792549, having an extended magazine and a missing stock. Found by arresting officers in an area containing the personal belongings of Walter Pugh, was a bag containing two handguns described as .22 caliber revolvers.

7. On May 3, 2002, a known associate of Tyreese Pugh was interviewed by your affiant and Detective James Calhoun. This associate stated she accompanied Walter Pugh and Tyreese Pugh to Atlanta, Georgia following the robbery. While on the way to Georgia, this individual observed an undetermined amount of money on the bed at the motel where they stayed. Also observed by this individual were weapons which were in the possession of Walter Pugh and Tyreese Pugh. As to how the money was obtained, this individual was told by Walter Pugh that they "hit a lick". Furthermore, this individual was told by Walter Pugh that he had gone into the vault at the bank and Tyreese was watching the door of the bank.

8. On April 26, 2002, a criminal history inquiry initiated by your affiant for Walter Pugh reveals several prior convictions. These convictions include weapon under disability, felonious assault, involuntary manslaughter, burglary, and aggravated assault.

9. On April 26, 2002, a criminal history inquiry initiated by your affiant for Tyreese Pugh reveals prior felony

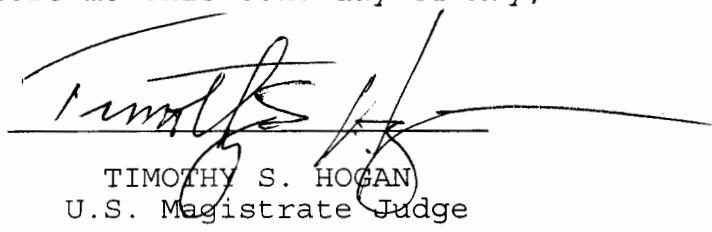
convictions. These convictions include possession of drugs, drug trafficking, and aggravated riot. Furthermore, at the time of his arrest by the Hamilton County Sheriff's Office, Tyreese Pugh was wanted for parole violation by the Ohio Department of Rehabilitation and Corrections, Adult Parole Authority.

10. Affiant believes there exists sufficient probable cause to believe Walter Pugh and Tyreese Pugh committed the armed robbery of First National Bank of Southwestern Ohio on April 24, 2002, and asks that a warrant be issued to arrest Walter Pugh and Tyreese Pugh for violation of Title 18, United States Code, Sections 2113 (a) (d) and 2.



Terence F. Moran  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed to before me this 6th. day of May, 2002.



TIMOTHY S. HOGAN  
U.S. Magistrate Judge